

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

In re:

CHARLES L. HATCH
THERESA A. HATCH

Case No. 05-70650-SCS
Chapter 13

Debtor(s) .

LONG BEACH MORTGAGE
C/O WASHINGTON MUTUAL BANK, F.A.
9601 McCallister Freeway, Suite 110
San Antonio, TX 78216
Plaintiff,

v.

CMN

CHARLES E. HATCH
THERESA A. HATCH,
GEORGE W. NEAL, Trustee,

Defendant(s) .

A N S W E R

COME NOW the debtors by counsel, and for their answer to the Motion For Relief from Stay filed herein, represents that they have no objection to the entry of the order.

1. The debtors' anticipate surrendering the real estate located at 313 Madison Avenue, Franklin, Virginia back to Long Beach Mortgage.

WHEREFORE, the counsel for the Debtors pray that the motion for relief requested by Howard N. Bierman, Esquire, counsel for Long Beach Mortgage be granted.

James L. Pedigo, Jr., Esquire (VSB #30796)
Counsel for Debtors
ALEXANDER P. SMITH AND ASSOCIATES, P.C.
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CHARLES E. HATCH
THERESA A. HATCH

By /s/ James L. Pedigo, Jr.
Of Counsel

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing Answer was mailed/or electronically forward this 27th day of April, 2005 to Howard N. Bierman, Esquire, Counsel for Long Beach Mortgage, Bierman, Geesing & Ward, L.L.C., 7315 Wisconsin Avenue, Bethesda, MD 20814; George W. Neal, Trustee, 870 Greenbrier Circle, Suite 402, Chesapeake, VA 23320, the debtors 301 Morton Street, Franklin, VA 23851.

/s/James L. Pedigo, Jr.
James L. Pedigo, Jr., Esquire

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